

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT

V

Superintendent Robert Smith
Dr. Cynthia Freeland
Dr. Rachel Burdette
Correct Care Solutions
Medical/RN John Does et al.,

FILED
SCRANTON

DEC 18 2017

PER

DEPUTY CLERK

MOTION TO APPOINT COUNSEL

I, Sandra Williams, Pro Se respectfully request this Court to Appoint Counsel to represent me for the following reasons set forth below;

1. I have been incarcerated ten years and have not obtained my G.E.D. though I am trying. I only went to the 9th grade. I have no knowledge of case law, legal terminology, book law, or just any understanding of criminal or civil law.
2. I am aware from other pro se inmates who have filed unsuccessfully 1983 that the Middle District Pro Bono panel does not accept ANY inmate cases with or without merit. My case has merit. People are dying in here and don't have to be if they were getting the correct medical care.
3. The inmate law clerks are prohibited from assisting an inmate in a criminal or especially a 1983 case. They will hand you a PCRA but not a 1983. This is policy by the Pennsylvania Department of Corrections and can be verified.
4. I am respectfully requesting the Court, at the assistance of an inmate assisting me to appoint me Angus R. Love of the Pennsylvania Institutional Law Project in Phila, Pa or a Pro Bono firm that does represent inmate 1983, Dechert LLP in Phila, Pa without the help of one of them I cannot litigate this case and neither can the girl helping me.

IV. STATEMENT OF CLAIM

1. February 29, 2016, continuous, persistent stomach pain, severe weight loss, sick call charged \$10.00 pre-existing condition.
2. April 5, 2016 charged \$5.00 sick call for chronic, severe stomach pain, no bowel movements.
3. May 2, 2016 told my colon was full of stool take lactulos, charged \$5.00 sick call for pre-existing condition and told to return the next day to see if the medication worked. And charged me \$5.00 again for on-going pre-existing condition. They tried me on another medication and then multiple x-rays, blood work and alot of different medications with no results.
- 4 May 31, 2016 medical told me I was 'diabetic', charged me \$10.00 for chronic condition. I asked the doctor to tell me more about it and my sugar and RN Temple told me "to go to the law library and look it up"
5. The medical department never checked my sugar again until a new lady came and took my sugar on October 11, 2017 and found out my level had increased.
6. June 2, 2016 charged \$10.00 for chronic on-going pre-existing condition of severe stomach pain, no bowel movements, weight loss.
7. August 18, 2016 charged \$5.00 for on-going, chronic, pre-existing condition stomach pain.
8. November 16, 2016 told me I have 'pilory' a stomach bacteria, never heard anything about it after that. Continuous antibiotics eventually dehydrated me more, no bowel movements.
9. July 19, 2016 my toe got infected and while walking my entire foot went numb. Correctional Officer Baldwin took me to the Infirmary where I was seen by RN Temple who sent me back to my unit with no care whatsoever. When I got outside with Officer Baldwin I saw LPN Webb and RN Young and they told me to sit in a wheelchair and looked at my foot and noticed the bottom of my foot was turning black. So LPN Webb and RN Young went back and forth about who was going to approach RN Temple about bringing me back in there after she put me out. LPN Webb said she would rather argue with RN Temple then for me to lose my foot. They wheeled me back in there and and literally argued with RN Temple in front of several witnesses. Then RN Temple sent me to the OB/GYN Doctor Marc Landsburg he made me sign for novacaine to numb my foot and squeezed all the infected puss and blood out of my foot

I filled the paper work out to the best of my ability
I really don't know what I'm doing, can you please
appoint me counsel